

Safety Evaluation Number¹: SE-W375-00-00016Revision No: 0ABCN Number: ABCN-W375-00-00024Safety Evaluation Subject: Tailor SRD Fire Safety Criteria and Associated Implementing Standards**PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE**

1. Describe the proposed revision (including credible failure modes, if applicable).

Tailor Safety Requirements Document (SRD) Safety Criteria 4.5 – 4, – 15, and – 22 and SRD 4.5 Implementing Standards DOE G-440.1, DOE-STD-1066-97, and NFPA 801-95.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The Safety Requirements Document (BNFL-5193-SRD-01) is the authorization basis document impacted by this change. SRD Safety Criteria 4.5 – 4, – 15, and – 22 are being tailored. Also, SRD 4.5 Implementing Standards DOE G-440.1, DOE-STD-1066-97, and NFPA 801-95 are being tailored. As shown in the attachment, these changes will (1) more accurately align the requirements with the status of RPP-WTP as a private facility, (2) clarify design and regulatory responsibilities, (3) resolve inconsistencies between the safety criteria and the implementing standards, (4) provide clarification to permit the Hanford Fire Department to provide emergency services, (5) provide other technical clarifications, (6) adopt a more recent NFPA requirement regarding decontaminable coatings, and (7) delete non-applicable material.

Attachment 1 is a matrix illustrating the SRD criteria and implementing standard sections affected by this revision/tailoring exercise.

This revision/tailoring exercise provides clarification of the affected SRD criteria and its implementing standards. As such, this SRD change does not:

- significantly modify the requirements of the implementing standards as identified in the SRD
- represent a significant reduction in commitment contained in the authorization basis, or
- represent a significant reduction in the effectiveness of any program, plan or procedure contained in the authorization basis.

3. List the references used for the safety evaluation.

- DOE/RL-96-0006, Revision 1, Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for TWRS Privatization Contractors
- RL/REG-97-13, Revision 5, Regulatory Unit Position on Contractor-Initiated Changes to the Authorization Basis
- Commitment List dated March 23, 2000.
- DOE/RL-98-20, Rev. 1, DOE Regulatory Unit Evaluation of BNFL Inc. Safety Requirements Document

¹ The Safety Evaluation Number shall be obtained from Project Document Control.

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4. Describe the planned revision implementation schedule.

The changes to the SRD will be incorporated within 30 days of RU approval of the authorization basis change request. No other changes to procedures or plans have been identified to implement this change request.

PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- | | <u>YES</u> | <u>NO</u> |
|---|-------------------------------------|--------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

JUSTIFICATION:

As discussed above, this change does modify a standard in that it tailors SRD Safety Criteria 4.5 – 4, – 15, and – 22 and Implementing Standards DOE G-440.1, DOE-STD-1066-97, and NFPA 801-95 as referenced in Section 4-5 of the SRD. The Attachment 1 matrix shows the nature and detailed justification for the tailoring.

- | | | |
|---|-------------------------------------|--------------------------|
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|

JUSTIFICATION:

The attachment to this SE demonstrates that the tailoring of the fire protection SRD safety criteria implementing standards does not reduce the AB commitments for Items 1 through 28 and 30. Item 29 is technically a reduction in commitment but is not considered to have a significant impact on fire safety. The Item 29 change adopts the wording of a later version of NFPA 801 (1998 v.s. 1995) that changes the requirement for interior finish coatings in areas processing or storing radioactive materials from “shall be noncombustible” to “shall be limited combustible,” in recognition of the impracticality of meeting the original requirement.

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- | | <u>YES</u> | <u>NO</u> |
|---|-------------------------------------|--------------------------|
| 3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

JUSTIFICATION:

The attachment to this SE demonstrates that the tailoring of the fire protection SRD safety criteria and implementing standards does not reduce the effectiveness of any program, procedure, or plan described in the AB for Items 1 through 28 and 30. Item 29 will technically reduce the effectiveness of the fire safety program by permitting small quantities of limited combustible coating materials to be applied to structural surfaces to facilitate future decontamination efforts. This change is not considered to have a significant impact on fire safety.

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

PART III: SAFETY EVALUATION CONCLUSION

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

Evaluator/Originator

Date

Reviewer²

Date

Radiation Safety and Regulatory Manager

Date

² The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

Safety Evaluation

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Chair, Project Safety Committee³

Date

RPP-WTP General Manager³

Date

³ This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.